Todd R. G. Hill 119 Vine Street Belton, TX 76513 +1 [661] 899-8899 toddryangregoryhill@gmail.com *In Propria Persona* 

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### UNITED STATES DISTRICT COURT FOR THE CENTRAL DISTRICT OF CALIFORNIA

#### WESTERN DIVISION

TODD R. G. HILL, et al,

**Plaintiffs** 

VS.

THE BOARD OF DIRECTORS, OFFICERS AND AGENTS AND INDIVIDUALS OF THE PEOPLES COLLEGE OF LAW, et al.,

Defendants.

CIVIL ACTION NO. 2:23-cv-01298-JLS-BFM

**The Hon. Josephine L. Staton**Courtroom 8A, 8th Floor

Magistrate Judge Brianna Fuller Mircheff Courtroom 780, 7th Floor

NOTICE OF SUPPLEMENTAL REQUEST FOR JUDICIAL NOTICE REGARDING DEFENDANT SPIRO'S REPRESENTATIONS OF GOVERNANCE AUTHORITY AND FACTUAL KNOWLEDGE

**NO ORAL ARGUMENT REQUESTED** 

NOTICE OF SUPPLEMENTAL REQUEST FOR JUDICIAL NOTICE REGARDING DEFENDANT SPIRO'S REPRESENTATIONS OF GOVERNANCE AUTHORITY AND FACTUAL KNOWLEDGE

### Case 2:23-cv-01298-JLS-BFM Document 276 Filed 04/23/25 Page 2 of 20 Page ID #:9530

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# NOTICE OF SUPPLEMENTAL REQUEST FOR JUDICIAL NOTICE REGARDING DEFENDANT SPIRO'S REPRESENTATIONS OF GOVERNANCE AUTHORITY AND FACTUAL KNOWLEDGE

TO THE HONORABLE COURT AND ALL PARTIES OF RECORD:

Plaintiff respectfully submits this request for judicial notice for the limited purpose of clarifying the evidentiary record in light of assertions made in Dockets 273 and 274 regarding Defendant Spiro's status and authority at the relevant time. The attached exhibits include contemporaneous internal documents and communications, including one authored or controlled by Defendant Spiro, that are capable of accurate and ready determination and whose authenticity cannot reasonably be questioned. These documents establish that Defendant Spiro did not hold corporate officer or director status at the relevant time and contradict any claim of immunity or lack of fiduciary responsibility.

Plaintiff does not ask the Court to resolve factual disputes through this request, but rather to acknowledge that the record is incomplete without these materials and that the factual assertions presented in Docket 273 and 274 are not dispositive at the pleading stage. Judicial notice is thus appropriate under FRE 201(b) to ensure the Court has access to a complete procedural and institutional context.

# NOTICE OF SUPPLEMENTAL REQUEST FOR JUDICIAL NOTICE REGARDING DEFENDANT SPIRO'S REPRESENTATIONS OF GOVERNANCE AUTHORITY AND FACTUAL KNOWLEDGE

Accordingly, these document are submitted to correct factual misstatements and preserve the integrity of the judicial record under FRE 201(b) and FRCP 12(d).

#### MEMORANDUM OF POINTS AND AUTHORITIES

#### I. REQUEST FOR JUDICIAL NOTICE

Plaintiff respectfully requests that the Court take judicial notice of the following documents:

## A. MEETING MINUTES OF THE PEOPLES COLLEGE OF LAW, DECEMBER 12, 2020 (UNOFFICIAL COMPLETE VERSION)

This document, marked as EXHIBIT A, is the complete, contemporaneous record of the December 12, 2020 membership meeting of Peoples College of Law. It reflects detailed admissions by Defendant Spiro regarding unresolved accreditation deficiencies, institutional recordkeeping practices, and proposed governance amendments. Although the meeting lacked a quorum and could not formally ratify actions, it serves as persuasive evidence of Spiro's personal knowledge of, and involvement in, the very systems and failures now at issue in this litigation. Its content is inconsistent with Spiro's representations of his Board Membership in Docket 273 and is highly probative of fiduciary awareness and the concealment of operational noncompliance.

### B. JUDICIALLY NOTICEABLE ADMISSION THAT SPIRO WAS NOT A BOARD MEMBER OR OFFICER DURING EVENTS AT ISSUE

EXHIBIT B is a contemporaneous email authored by Defendant Ira Spiro on December 12, 2020,

# NOTICE OF SUPPLEMENTAL REQUEST FOR JUDICIAL NOTICE REGARDING DEFENDANT SPIRO'S REPRESENTATIONS OF GOVERNANCE AUTHORITY AND FACTUAL KNOWLEDGE

in which he proposes an amendment to PCL's bylaws to formally recognize the role of Dean as a corporate officer. In his own words, Spiro writes:

"The second attached amendment is to make it clear that the dean is an officer of the PCL corporation. The bylaws don't even mention a dean, yet the Bar requires that we have a dean. I proposed this amendment. For a number of reasons, I feel that neither I nor anyone else should serve as dean without this amendment."

This statement demonstrates that:

conferred it during the timeframe at issue.

2.5

- 1. At the time of the events in question, Spiro was not a corporate officer or member of the Board, but rather recognized the absence of such formal designation;
- 2. Spiro explicitly states that the Dean was not recognized in the bylaws, and that the amendment was necessary to create that authority;
- 3. He conditioned further service in the Dean role on the passage of this amendment, which, based on the contemporaneous meeting minutes, was never ratified due to lack of quorum. Accordingly, this document independently establishes that Spiro did not hold officer or director status under PCL's governing instruments at the relevant time and thus is not entitled to invoke California Corporations Code § 5047.5(b) immunity. That provision applies only to individuals acting as unpaid officers or directors of nonprofit corporations. Spiro's own written statement confirms he sought such recognition, but did not hold it and that no amendment formally

Therefore, Spiro's invocation of immunity in Docket 273 is factually unsupported and contradicted by his own contemporaneous admissions.

NOTICE OF SUPPLEMENTAL REQUEST FOR JUDICIAL NOTICE REGARDING DEFENDANT SPIRO'S REPRESENTATIONS OF GOVERNANCE AUTHORITY AND FACTUAL KNOWLEDGE

#### C. EMAIL FROM TODD HILL AS BOARD SECRETARY

EXHIBIT C is a contemporaneous set of meeting minutes from the December 13, 2020 Membership Meeting of Peoples College of Law (PCL), which reflects that Plaintiff, Todd Hill, was serving as Secretary of the Board of Directors during the relevant time period and that Exhibit B was intended as a complete reflection of events.

This document also bolsters Plaintiff's contention that Spiro's claim to officer status was prospective only, and that Plaintiff by contrast held an actual, active Board seat at the time. This distinction is directly material to both the substance of Plaintiff's claims and to rebut Spiro's efforts to invoke protections under Corporations Code § 5047.5(b).

True and correct copies of each of the above documents are attached hereto as Exhibits A, B, and C, respectively.

#### II. LEGAL STANDARD FOR JUDICIAL NOTICE

Federal Rule of Evidence 201(b)(2) permits judicial notice of facts that can be accurately and readily determined from sources whose accuracy cannot reasonably be questioned. The attached documents are either internal institutional records or authenticated communications authored by Defendant Spiro himself. Their content is not subject to reasonable dispute, and they bear directly on factual contentions made in Docket 273 and Docket 274.

These materials are not offered for the truth of the assertions within them but to establish

Defendant Spiro's personal knowledge, governance role, and awareness of institutional practices and

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GOVERNANCE ROLE AND INDEMNIFICATION STATUS

The documents are directly relevant to:

legal compliance risks — matters that go directly to the plausibility and good faith of his factual representations in this proceeding.

Pursuant to Federal Rule of Evidence 201, judicial notice is appropriate when the fact is not subject to reasonable dispute because it:

- 2. Is generally known within the trial court's territorial jurisdiction; or
- 3. Can be accurately and readily determined from sources whose accuracy cannot reasonably be questioned.

The Court may take judicial notice of its own prior orders, as well as the structure and labeling of pleadings on the docket. See Intri-Plex Techs., Inc. v. Crest Grp., Inc., 499 F.3d 1048, 1052 (9th Cir. 2007) ("A court may take judicial notice of its own records in other cases.").

#### III. **RELEVANCE**

The attached documents are directly relevant to material factual disputes raised in Defendant Spiro's Motion to Dismiss (Docket 273) and are necessary to correct the record in light of misstatements or omissions related to Defendant Spiro's role, institutional knowledge, and the regulatory environment of Peoples College of Law ("PCL") at the time of Plaintiff's enrollment and grievance activity.

A. THE FACTUAL BASIS TO CHALLENGE SPIRO'S MISREPRESENTATIONS OF

NOTICE OF SUPPLEMENTAL REQUEST FOR JUDICIAL NOTICE REGARDING DEFENDANT SPIRO'S REPRESENTATIONS OF GOVERNANCE AUTHORITY AND **FACTUAL KNOWLEDGE** 

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The December 12, 2020 email and the December 13, 2020 meeting minutes demonstrate that Defendant Spiro was an active participant in governance, not a passive instructor. He proposed a bylaw amendment to add the Dean as a voting member of the Community Board, participated in strategic planning, and reported directly to the membership about regulatory and compliance issues, including transcript systems and Bar-mandated reforms. Notably, the dates of these communications contravene his assertions related to Board Membership status and the applicability, if any, of California Corp Code § 5047.5(b) governing immunity.

#### B. MATERIAL CONTRADICTION OF SPIRO'S LITIGATION NARRATIVE

The full minutes reflect knowledge of ongoing Bar oversight, including unresolved items from the most recent inspection and plans for resuming community clinics and managing academic records through Populi. These topics are central to the RICO and negligence allegations and directly contradict the suggestion in Docket 273 that Plaintiff's claims arise in a vacuum or are purely conclusory.

### C. PROBATIVE OF SPIRO'S AWARENESS OF THE TRANSCRIPT AND GOVERNANCE FAILURES AT ISSUE

Defendant Spiro cannot simultaneously disclaim knowledge of, or distance from, institutional breakdowns while personally reporting to the membership on those exact failures — including unresolved inspection items, the need for improved recordkeeping systems, and the use of remote instruction platforms that are now central to the transcript fraud allegations.

NOTICE OF SUPPLEMENTAL REQUEST FOR JUDICIAL NOTICE REGARDING DEFENDANT SPIRO'S REPRESENTATIONS OF GOVERNANCE AUTHORITY AND FACTUAL KNOWLEDGE

### D. DEMONSTRATES SPIRO'S SELECTIVE DISCLOSURE OR WITHHOLDING OF MATERIAL FACTS

The December 13, 2020 draft "minutes" (filed or distributed separately) present in direct contradiction to Spiro's statements, although he was clearly involved and aware of the content of the meeting and their resolution, or lack thereof. The divergence between the two versions supports Plaintiff's assertion of selective concealment or post-hoc record shaping, all of which are relevant to Plaintiff's theory of predicate acts, the obstruction of transparency and Defendant Spiro's candor.

### E. PROCEDURAL NECESSITY TO PREVENT MISUSE OF INCOMPLETE RECORD AT 12(B)(6) STAGE

If the Court is asked to consider Spiro's statements or role as dispositive of liability or immunity at the pleading stage, it must have a complete and accurate evidentiary foundation. These documents establish the existence of material factual disputes — including those directly bearing on whether Spiro acted within the scope of a fiduciary role and whether immunity claims are properly raised at this juncture.

Accordingly, Plaintiff submits that the Court may take judicial notice of these documents for the limited and appropriate purpose of resolving whether the record, as framed by Defendant Spiro, is consistent with contemporaneous admissions and internal documents. Their admission does not convert the motion to one for summary judgment but rather ensures the Court is not misled by incomplete or self-serving factual characterizations at the Rule 12(b)(6) stage. Although Plaintiff has not yet received his J.D. degree, Spiro's assertion that Plaintiff was categorically ineligible presents a factual dispute, not a settled legal question. It therefore cannot support dismissal under Rule 12(b)(6).

# NOTICE OF SUPPLEMENTAL REQUEST FOR JUDICIAL NOTICE REGARDING DEFENDANT SPIRO'S REPRESENTATIONS OF GOVERNANCE AUTHORITY AND FACTUAL KNOWLEDGE

#### IV. CONCLUSION

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For the foregoing reasons, Plaintiff respectfully requests that the Court take judicial notice of the attached Exhibits A through C, and consider them for the limited and appropriate purposes set forth herein.

Dated: April 23, 2025 Respectfully submitted,



Todd R. G. Hill Plaintiff, Pro Se

#### STATEMENT OF COMPLIANCE WITH LOCAL RULE 11-6.1

The undersigned party certifies that this brief contains 1,590 words, which complies with the 7,000-word limit of L.R. 11-6.1.

Respectfully submitted,



April 23, 2025 Todd R.G. Hill Plaintiff, in Propria Persona

#### Plaintiff's Proof of Service

NOTICE OF SUPPLEMENTAL REQUEST FOR JUDICIAL NOTICE REGARDING DEFENDANT SPIRO'S REPRESENTATIONS OF GOVERNANCE AUTHORITY AND FACTUAL KNOWLEDGE

This section confirms that all necessary documents will be properly served pursuant to L.R. 5-3.2.1 Service. This document will be/has been electronically filed. The electronic filing of a document causes a "Notice of Electronic Filing" ("NEF") to be automatically generated by the CM/ECF System and sent by e-mail to: (1) all attorneys who have appeared in the case in this Court and (2) all pro se parties who have been granted leave to file documents electronically in the case pursuant to L.R. 5-4.1.1 or who have appeared in the case and are registered to receive service through the CM/ECF System pursuant to L.R. 5-3.2.2. Unless service is governed by Fed. R. Civ. P. 4 or L.R. 79-5.3, service with this electronic NEF will constitute service pursuant to the Federal Rules of Civil Procedure, and the NEF itself will constitute proof of service for individuals so served. Respectfully submitted,



April 23, 2025

Todd R.G. Hill

| Plaintiff, in Propria Persona

NOTICE OF SUPPLEMENTAL REQUEST FOR JUDICIAL NOTICE REGARDING DEFENDANT SPIRO'S REPRESENTATIONS OF GOVERNANCE AUTHORITY AND FACTUAL KNOWLEDGE

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December 13, 2020 – Membership Meeting – 10 a.m.

#### <u>In Attendance:</u>

Ira Spiro

Carol DeuPree

Christina Gonzalez

Gloria Perez-Stewart

Brenda Harrison Young

**Brian Godfrey** 

**Gary Silbiger** 

**Heather Williams** 

John Dwayne

Nicole Reese

**Robert Wymms** 

**Pascual Torres** 

Bee Roister

Anna Hawkins

Jill Marucut

Todd Hill

#### **Library Donation**

Ira reporting. Major donation.

Revealed by Ms. DeuPree that certain artwork donated several years ago is still in possession of members, and should be reclaimed because is valued in excess of \$40,000.

#### Online Fundraising

Ira and Brian reporting. Auction and second event in March 2021. Auction ends December 18<sup>th</sup>, 2020.

#### **Development Committee**

Hector, Brian, Anna, and the paid fundraiser, and Gary Silberger are now participating in an active committee. Can always use more assistance.

#### Strategic Planning Update

Ira reporting. Good strategic planning session. A variety of good ideas generated. In addition, the State Bar has informed us that PCL needs to develop a strategic plan.

#### Resumption of Community Legal Clinics

Ira reporting. Last clinic was in 2016. Lawyers came to PCL and the community was informed of availability of in-person legal advice. Lawyers gave advice to clients.

PCL is getting close to the resumption of those activities. Last two summers, students have worked with attorney's during their clinical classes in criminal defense and eviction counseling.

Online clinical options can include employment, credit counseling (especially given the lapse of tenant protections in March 2021), DACA/Immigration, etc. We will be sending out solicitations.

#### Populi and Teams

Anna and Todd reporting. Ira. Teams is what we use for teaching classes. Populi captures and organizes student and teach related data.

Remote teaching has improved attendance. The requirement is that we return to -in person teaching when appropriate.

#### State Bar Inspection

Ira reporting. PCL is required to be inspected as a registered school every 5 years as a fixed-facility school. The inspection involves a retired Dean's examination of every aspect of the school.

Preliminary indication was that the Bar was leaning towards probation because last two inspections did not result in significant follow-through. Twenty-six (26) items to address.

In the end, PCL fixed 20 of the items. One item re filing of a DBA, was erroneously identified.

PCL is required to make an annual update of the inspection report. Next inspection scheduled for 2022.

Library books may be required. California reports of the courts of appeals, digests, etc. Those subscriptions are costly. Also need the current version of the books that are taught for class.

#### **VOTING ON 2 BY-LAW AMENDMENTS**

No quorum present to effect vote.

#### **Open Comments**

Anna - Annual Fundraiser. March 25, 2021 Fundraiser. Hank Di Suvero passed, and would like to honor for this fundraiser. Ira/Gary also mentioned Carlos Holguin, the main attorney on the Flores case, restricting the time of non-adults can be held in immigration detention. Works for a law office in Los

Filed 04/23/25

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Angeles. Became a general discussion about honoring graduates. Looking for input on annual fundraiser plans. Tomas Olmos suggested by Ms. DuuPree. Tomas passed this year. His wife taught classes as well; Delores Leon. Jerry Stiles and Jorge Cabrera passed as well.

#### Closing:

Intent to have the meetings twice a year. Covid interrupted the April meeting.

Please go to the auction online.

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Todd Hill <toddryangregoryhill@gmail.com>

## PCL bylaw amendments for vote at this Sunday's membership meeting (meeting starts at 10 am)

1 message

Ira Spiro <ira@spirolawcorp.com>

Sat, Dec 12, 2020 at 11:32 AM

Dear Members of PCL Community

Attached are two bylaw amendments that should be voted on at this Sunday's membership meeting if we have a quorum at the meeting. Both are on this single pdf. The bylaws say that amendments adopted by the Board are to be voted on at the next membership meeting. We haven't been able to vote on them at a membership meeting yet because of lack of a quorum.

The first attached amendment adds a new category of PCL Members, namely At Large Members. The purpose of the amendment is to allow progressive social change advocates to become members even if they do not qualify under the other categories of membership. People don't qualify under those categories if they are not current or former not students, faculty, Board members, officers or employees of PCL. The idea is that there are people who can and to contribute a great deal to PCL but don't fit in the other categories. Note that in order to become members, they have to submit an application and they have to be approved by a two thirds vote of the Board.

The second attached amendment is to make it clear that the dean is an officer of the PCL corporation. The bylaws don't even mention a dean, yet the Bar requires that we have a dean. I proposed this amendment. For a number of reasons, I feel that neither I nor anyone else should serve as dean without this amendment.

Ira Spiro, Dean

P.S. Below, again, is the Zoom info for the meeting

#### **ZOOM INFORMATION**

Topic: PCL Membership Meeting Dec 2020

Time: Dec 13, 2020 10:00 AM Pacific Time (US and Canada)

#### Join Zoom Meeting

https://us02web.zoom.us/j/81796549239?pwd=aXF1ZWprbXYvdWExZWprRGkxT1E4dz09

4/23/25, 9:1**Qase 2:23-cv-0129&ndLScB5M**w am**Documento276**his strilegts 04/23/25 meethage et al. of 12 of 2

Meeting ID: 817 9654 9239

Passcode: 282884

One tap mobile

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+13462487799,,81796549239#,,,,,0#,,282884# US (Houston)

### Dial by your location

- +1 669 900 683 3 US (San Jose)
- +1 346 248 7799 US (Houston)
- +1253 215 8782 US (Tacoma)
- +1 301 715 8592 US (Washington D.C)
- +1 312 626 6799 US (Chicago)
- +1 929 205 6099 US (New York)

Meeting ID: 817 9654 9239

Passcode: 282884

Find your local number: https://us02web.zoom.us/u/kfWwSsjir

THIS EMAIL MAY BE CONFIDENTIAL AND COVERED BY THE ATTORNEY-CLIENT PRIVILEGE. IF YOU HAVE RECEIVED IT IN ERROR, PLEASE PERMANENTLY DELETE IT IMMEDIATELY

Bylaws for vote at Membership Mtg 12-13-20.pdf 78K

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Todd Hill <toddryangregoryhill@gmail.com>

### Member Meeting Minutes for December 13, 2020

2 messages

Todd Hill <toddryangregoryhill@gmail.com>

Sun, Dec 13, 2020 at 11:25 AM

To: Gloria Perez-Stewart <gloriaperez@gmail.com>, Ira Spiro <ira@spirolawcorp.com>, Robert Wymss <rwymss@yahoo.com>, "Christina Gonzalez (christina.marin.gonzalez@gmail.com)" <christina.marin.gonzalez@gmail.com>, hector pena <hectorpena@ucla.edu>, Nicole Reese <msnreese@aol.com>, Anna Hawkins <pclhawkins@gmail.com>

Please find today's member meeting minutes and review for any gaps.

Otherwise, these are complete.

#### Todd

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December 13 PCL Membership Meeting.docx 15K

**Robert Wymss** <rwymss@yahoo.com>
To: Todd Hill <toddryangregoryhill@gmail.com>

Sun, Dec 13, 2020 at 12:09 PM

Thanks for this Todd. Also, the correct spelling of my last name is Wymss. Not sure if this is a one-off misspelling, but wanted to bring your attention to it.

Robert

[Quoted text hidden]